

CRAIG A. NEWBY (NSBN 8591)
McDONALD CARANO WILSON LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, NV 89102
Telephone: 702.873.4100
Facsimile: 702.873.9966
cnewby@mcdonaldcarano.com

RYAN G. BAKER (*pro hac vice*)
BAKER MARQUART LLP
10990 Wilshire Boulevard, Fourth Floor
Los Angeles, CA 90024
Telephone: 424.652.7800
Facsimile: 424.652.7850
rbaker@bakermarquart.com

Attorneys for Plaintiffs
Hologram USA, Inc., MDH Hologram
Limited and Uwe Maass

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HOLOGRAM USA, INC., a Delaware corporation;
MUSION DAS HOLOGRAM LIMITED, a
corporation organized under the laws of the United
Kingdom; and UWE MAASS, an individual,

Plaintiffs,

v.

PULSE EVOLUTION CORPORATION, a Nevada
corporation; PULSE ENTERTAINMENT
CORPORATION, a Delaware corporation; JOHN
C. TEXTOR, an individual; DICK CLARK
PRODUCTIONS, INC., a Delaware corporation;
JOHN BRANCA and JOHN MCCLAIN, Executors
of the Estate of Michael J. Jackson; MJJ
PRODUCTIONS, INC., a California corporation;
MUSION EVENTS LTD., a United Kingdom
private company; MUSION3D LTD., a United
Kingdom private company; WILLIAM JAMES
ROCK, an individual; IAN CHRISTOPHER
O'CONNELL, an individual; and DOES 1 through
10,

Defendants.

Case No.: 2:14-cv-00772-GMN-NJK

**AMENDED JOINT STIPULATION OF
DISMISSAL WITHOUT PREJUDICE
AS TO DEFENDANTS DICK CLARK
PRODUCTIONS INC., MJJ
PRODUCTIONS, INC., AND JOHN
BRANCA AND JOHN MCCLAIN IN
THEIR CAPACITIES AS CO-
EXECUTORS OF THE ESTATE OF
MICHAEL J. JACKSON**

10386.00247/328850.1

AMENDED JOINT STIPULATION

Plaintiffs Hologram USA, Inc., MDH Hologram Limited and Uwe Maass (collectively, “Plaintiffs”) and Defendants dick clark productions, inc., MJJ Productions, Inc., and John Branca and John McClain, in their capacities as co-executors of the Estate of Michael J. Jackson, (collectively, the “Jackson Defendants”) (Plaintiffs and Defendants each a “Party” and collectively the “Parties”), by and through undersigned counsel and pursuant to Federal Rules of Civil Procedure, state as follows:

WHEREAS, on May 15, 2014, Plaintiffs filed this action (Dkt. No. 1);

WHEREAS, on January 30, 2015, Plaintiffs filed a Second Amended Complaint (Dk. No. 188) (the operative complaint in this case);

WHEREAS, on March 13, 2015, the Jackson Defendants, together with several other defendants in this action, filed a motion to dismiss the Second Amended Complaint (Dkt. 210), which remains pending before this Court;

WHEREAS, the Jackson Defendants have not answered the Second Amended Complaint;

WHEREAS, pursuant to Federal Rule of Civil Procedure 41(a), Plaintiffs and the Jackson Defendants have stipulated to a dismissal without prejudice of all claims asserted against the Jackson Defendants (and only the Jackson Defendants) in the above-entitled action, Case No. 14-cv-00772-GMN-NJK;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and the Jackson Defendants to this action and through their counsel of record that:

1. The Court shall dismiss all of the claims asserted against the Jackson Defendants in Case No. 14-cv-00772-GMN-NJK without prejudice pursuant to Federal Rule of Civil Procedure 41(a).

2. Each Party will bear its own costs and attorneys’ fees, except that the parties reserve all rights to seek the costs and fees incurred herein should the claims in the above-entitled action be re-filed.

1 DATED: November 6, 2015

McDONALD CARANO WILSON LLP

2 By: /s/ Ryan G. Baker
3 CRAIG A. NEWBY (#8591)
4 2300 W. Sahara Avenue, #1200
5 Las Vegas, Nevada 89102
6 Telephone: 702.873.4100
7 Facsimile: 702.873.9966
8 cnewby@mcdonaldcarano.com

9 BAKER MARQUART LLP
10 RYAN G. BAKER (*pro hac vice*)
11 10990 Wilshire Boulevard, Fourth Floor
12 Los Angeles, CA 90024
13 Telephone: 424.652.7800
14 Fax: 424.652.7850
15 rbaker@bakermarquart.com

16 *Attorneys for Plaintiffs Hologram USA, Inc., MDH*
17 *Hologram Limited and Uwe Maass*

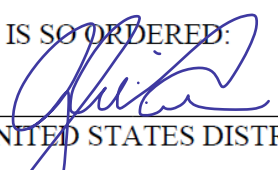
18 DATED: November 6, 2015

DICKINSON WRIGHT PLLC

19 By: /s/ Gregory Korn
20 MICHAEL N. FEDER (#7332)
21 8363 West Sunset Road
22 Suite 200
23 Las Vegas, NV 89113-2210
24 Phone: 702-382-4002
25 Fax: 702-382-1661
26 mfeder@dickinson-wright.com

27 GREGORY KORN (*pro hac vice*)
28 JONATHAN STEINSAPIR (*pro hac vice*)
KINSELLA WEITZMAN ISER KIMP &
ALDSERT LLP
808 Wilshire Blvd., 3rd Floor
Santa Monica, CA 90401
Phone: (310) 566-9800
Fax: (310) 566-9850
jsteinsapir@kwikalaw.com
gkorn@kwikalaw.com

29 IT IS SO ORDERED:

30 
31 UNITED STATES DISTRICT JUDGE

32 DATED: November 9, 2015

33 *Attorneys for Defendants MJJ Productions*
34 *Inc., John Branca and John McClain as*
35 *Executors of the Estate of Michael J. Jackson*
36 *and dick clark productions, inc.*